

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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Copy

CHARLES ISELEY,
Plaintiff,
v.

W. CONWAY BUSHEY,
Defendants

FILED Civil Action No.
HARRISBURG : 00-CV-00577
JUN 14 2001
MARY E. DIANDREA, CLERK
PER [initials] DEPUTY CLERK

JUDGE'S COPY

REPLY BRIEF TO DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR EXTENCMENET OF TIME

The defendants' attorney, Lewis', claim that plaintiff's property was not sent because he refused to sign a cash slip is a vicious blatant lie. She is well aware that plaintiff signed a cash slip and noted same in his prison grievance appeal stating that his inventory property receipt clearly states "HUR" for Huntington State prison and "UPS" for United Parcel Service, and corroborated and verifies that a cash slip was completed prior to his being transferred.

In response to the appeal plaintiff's property is supposed to be sent, according to prison officials, and there is no need for plaintiff to file another cash slip. This, of course, not what the prison officials informed judge Kane regarding the policy.

Plaintiff has not received one page of discovery in response to his requests for production of documents. Plaintiff made several and all were ignored and plaintiff informed Lewis of that fact, in person, on the day of the deposition.

Plaintiff is in the hole has no adequate access to legal material is very sick and has no access to his property (lego 1).

The defendants will not be prejudiced in any way by permitting plaintiff an opportunity to file an amended complaint (plaintiff cannot add any defendants because judge Kane has barred him from discovery necessary to secure identities of John Doe defendants).

Moreover, plaintiff is about to be transferred to another prison.

Therefore, plaintiff should be granted an enlargement of time.

Date: June 10, 2001

Respectfully submitted,


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Plaintiff, : No. 3:00-CV-00577
v.
W. CONWAY BUSHLEY, et al.,
Defendants :

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing
Reply Brief to Defendants' Response to Plaintiff's Motion for
Enlargement of Time by mailing a copy of same to:

Maryanne Lewis, dag
Office of Atty. Gen.
15th Fl. Strawberry Sq.
Harrisburg, PA 17120

Date: June 10, 2001

Charles Isley